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Attorneys for Plaintiff  
MIGUEL VALENCIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MIGUEL VALENCIA,

Plaintiff,

v.

HYUNDAI MERCHANT MARINE  
COMPANY, LTD., HOPWELL  
NAVIGATION, INC. and DOES 1-20,

Defendants.

Case No. C05 02371 JCS

**STIPULATION AND PROPOSED ORDER  
REGARDING**

Plaintiff Miguel Valencia and defendant Hopewell Navigation Company stipulate to the following revised TRIAL PROCEDURES. This stipulation and proposed order is proffered because the parties will be returning to mediation and hope to settle this matter without spending the additional time and incurring additional expenses.

The parties stipulate only to change the dates on which the submissions are due:

**A.**

1. Proposed Final Pretrial order shall be filed no later than December 1, 2006.
2. Proposed Instructions shall be filed no later than December 1, 2006.

3. Memorandum of Law in support of disputed instructions shall be filed no later than December 1, 2006.
4. Joint Set of Proposed voire dire questions shall be filed no later than December 1, 2006.
5. Motions in limine shall be hand served but not filed by December 1, 2006. The responding party shall hand serve the opposition no later than December 6, 2006. The moving party shall file the collated motion and opposition together no later than December 8, 2006.
6. Trial briefs shall be filed no later than December 1, 2006.
7. Proposed verdict forms, joint or separate shall be filed no later than December 1, 2006.

**B.**

Objections to Exhibits shall be filed and served no later than December 6, 2006.

It is hereby stipulated.

Dated: November 3, 2006

WELTIN LAW OFFICE, P.C.

/s/

\_\_\_\_\_  
Patrick B. Streb  
Counsel for Plaintiff

/s/

Dated: November 6, 2006

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Andrew Port  
Emard, Danoff, Port & Tamulski  
Attorney for defendant Hopewell  
Navigation, Inc.

**CERTIFICATION OF SIGNATURES**

I attest that the content of this document is acceptable to all persons above,  
who were required to sign it.

*/s/ Patrick B. Streb*  
Patrick B. Streb

It is so ordered

Dated: November 6, 2006

